

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

MONIKER PRIVACY SERVICES
REGISTRANT 2125963, d/b/a
SUNPORNO.COM, "ADVERT",
"CASTA", "TRIKSTER", "WORKER",
"LIKIS", "TESTER" and DOES 1-50

Defendants

Case No. 11-cv-62107-KMW

FILED UNDER SEAL

DECLARATION OF JASON TUCKER
SUPPORTING *EX PARTE* MOTION FOR
ORDER PERMITTING ALTERNATE
SERVICE ON DEFENDANT MONIKER
PRIVACY SERVICES REGISTRANT
2125963

I, Jason Tucker, declare under penalty of perjury that:

1. I am over the age of 18 years old, make this declaration based upon personal knowledge and, if called to testify could and would testify competently to the facts set forth herein.

2. I am a consultant and the Enforcement Officer for Fraserside IP, LLC and Private Media Group (PRVT on NASDAQ).

3. Fraserside's highly sought after intellectual property is distributed on a wide range of platforms including mobile handsets via 104 network operators in 45 countries, digital TV via 38 platforms in 24 countries, broadband Internet, television broadcasting including its own South American cable channel in a venture with world famous Playboy™ and sold on DVD's, on demand and through subscription based web properties.

4. I have been involved in the industry of legal adult erotic entertainment production, marketing and management at an executive level for over ten (10) years serving for over six

years as President of a company that owns and licenses one of the world's largest erotic libraries of images.

5. I have personal knowledge of the owner/manager of the website SunPorno.com, and on information and belief, his name is Sergej Letyagin aka Serge Letyagin and he was born on June 20, 1980.

6. I have communicated with him extensively over the past few weeks via email.

7. I have learned that his email address is tgpalliance@gmail.com and have communicated with him on more than ten occasions at that email address.

8. Among my communications with Mr. Letyagin via the above email address, I sent him a copy of the X-Biz article covering this case on September 29, 2011. A version of this article is attached to the instant motion as Exhibit B.

9. On Thursday, September 29, 2011 at 23:33:59 +0200 hours, Mr. Letyagin replied to my email to him containing the X-Biz article from his address at tgpalliance@gmail.com writing, "Thanks for the link, we're going to look into this." A true and correct copy of this email is attached to this Declaration as Exhibit 1.

10. Furthermore, I have communicated with him via the internet based chat program known as Skype; his Skype address is Donald_Home.

11. On September 23, 2011 at 17:19:27 +0200 hours, Mr Letyagin emailed me from tgpalliance@gmail.com stating that, "My Skype is Donald_Home..." A true and correct copy of this email is attached to this Declaration as Exhibit 2.

12. In Skype's publicly available directory, the address provided is registered to an individual in the City of Prague located in the Czech Republic.

13. I have spoken to Sergej numerous times after my initial contact with him, all of which confirm to me that SunPorno.com managers and operators are located in Prague and not in the Post Office Box located in Seychelles.

14. In my time working with Fraserside, I have encountered Mr. Evan Fray-Witzer and Mr. Valentin Gurvits before in litigation.

15. Fraserside IP, LLC is litigating four cases in which Mr. Gurvits and Mr. Fray-Witzer are the Defendants Attorneys, those cases are in the Northern District Central Division of Iowa case numbers, 3:2011-cv-03005, 3:2011-cv-03025, 3:2011-cv-03040 and 3:2011-cv-03041.

16. I have personal knowledge of the style of tactics and methods Mr. Gurvits uses in his litigations.

17. In 3:2011-cv-03005 Mr. Gurvits, with both he and his client having full knowledge of the suit and the suit having been properly served, waited until a clerks entry of default was entered against his clients and we filed a motion for default to then file a motion to dismiss arguing jurisdiction and questioning service.

18. In 3:2011-cv-03025 Mr. Gurvits again waited until a clerks entry of default was entered against his clients and we filed a motion for default at which time the Defendants filed a motion to dismiss arguing jurisdiction.

19. On October 19, 2011 Fraserside's counsel received an email from Mr. Gurvits informing us that he will be representing the Defendants in case 3:2011-cv-03040 and that "initially we will be challenging service and jurisdiction." We have not yet served his client in this case yet he already has his strategy of avoiding answering the case determined.

20. On October 19, 2011 Fraserside's counsel received an email from Mr. Gurvits informing us that he will be representing the Defendants in case 3:2011-cv-03041 and again that "initially we will be challenging service and jurisdiction." Again, we have not yet served his client in this case yet he already has his strategy of avoiding answering the case determined.

21. His tactics are a pattern and appear to be his normal method of doing business, which is to counsel his clients to evade service and to take any steps possible to avoid the merits of claims against them.

Signed under penalty of perjury this 20th day of October, 2011 in Los Angeles, California.



Jason Tucker

EXHIBIT 1
to the Declaration of Jason Tucker

From: Serge Letyagin <tgpalliance@gmail.com>
Date: Thu, 29 Sep 2011 23:33:59 +0200
To: <jason@tucker.com>
Subject: Re: Private/SunPorno

Thanks for the link, we're going to look into this.

2011/9/29 Jason Tucker <jason@tucker.com>
My flight just landed and I saw this

http://m.xbiz.com/news_piece.php?id=139078&t=all&page=0

Jason Tucker

Sent via BlackBerry

EXHIBIT 2
to the Declaration of Jason Tucker

From: Serge Letyagin <sgpalliance@gmail.com>
Date: Fri, 23 Sep 2011 17:19:27 +0200
To: <jason@tucker.com>
Subject: Re: Private/SunPorno

My Skype is Donald_Home, icq 23834802. I prefer to type in Skype and just using it as an online messenger. But from what I see, you reply fast to emails, so you got used to one of these modern device already.

Anyways, let's see what are the options for the settlement?